## Federal Defenders OF NEW YORK, INC.

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Southern District of New York Jennifer L. Brown Attorney-in-Charge

March 9, 2020

## **BY ECF**

Honorable Gregory H. Woods United States District Judge Southern District of New York New York, New York 10007

## MEMORANDUM ENDORSED

Re: <u>United States v. Jose Reyes</u> 19 Cr. 306 (GHW)

Dear Judge Woods:

I am the attorney for Jose Reyes, the defendant in the above-captioned case, and write to request a thirty-day adjournment of the sentencing proceeding, which is currently scheduled for March 26, 2020. Per this Court's rules, sentencing submissions are due two weeks prior to the date of sentencing. In this case, however, we are still awaiting medical records that bear directly on an issue Probation cited in its initial Presentence Investigation Report as a factor that may warrant a sentence outside of the advisory guidelines. As such, these records are necessary as they will enable us to effectively represent Mr. Reyes at sentencing.

I have conferred with AUSA Cecilia Vogel and I understand that she does not object to this thirty-day adjournment. This is the second request for an adjournment of sentencing. Thank you for your consideration of this request.

Application granted. The sentencing hearing scheduled for March 26, 2020 is adjourned to April 29, 2020 at 4:00 p.m. Defendant's sentencing memorandum is due April 15, 2020; the Government's memorandum is due April 22, 2020. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 65.

Respectfully Submitted,

Marisa K. Cabrera

/s/ Marisa K. Cabrera Marisa K. Cabrera, Esq. Assistant Federal Defender Tel.: (212) 417-8730

SO ORDERED.

Dated: March 11, 2020 New York, New York

GREGORNH. WOODS United States District Judge